

The following questions were posed during the January 10th, 2003 open meeting for the cooperative agreement to be the lead non-federal co-sponsor of the next five annual Brownfields conferences. EPA is posting the answers to these questions to ensure that all potential applicants have equal access to these clarifications to the RFA.

How is the Exhibit Hall for the Brownfields annual conferences managed? Can an applicant include management of the Exhibit Hall in their proposal?

An applicant can, but is not required to, propose management of the Exhibit Hall in their proposal. Applicants should keep budget considerations and the ranking criteria in mind when making this decision.

In the past, under its co-sponsorship agreement with EPA, ICMA has independently funded, managed, and made logistical arrangements for Exhibitor space at the Brownfields annual conferences. ICMA solicited and charged exhibitors for use of the exhibit space, and retained those fees to offset its costs. Fees charged were reasonable. EPA was not involved in the securing of the hall nor the collection of registration and other fees by exhibitors.

Could an eligible applicant submit a proposal under this RFA for federal assistance just for the exhibit hall?

An applicant could submit a proposal for federal assistance for just the exhibit hall. However, this was not what EPA envisioned when crafting this RFA. Awarding this agreement for just the exhibit hall would require EPA to award a second cooperative agreement for the technical program of the annual Brownfields conferences. The applicant should keep in mind that their proposal will be evaluated based on the ranking criteria provided in the RFA, and that a proposal solely to run the exhibit hall of the conference may not receive a high overall score.

One of the ranking criteria under this RFA is “Leveraging of Additional Resources”? Is this a cost share requirement?

No. A cost share is not a requirement under this RFA. However, if a cost share is proposed, in the form of contribution of labor, material, or other services, it must be incurred for an eligible and allowable cost under the cooperative agreement and not for ineligible costs, such as administrative costs (see question below for further details on administrative cost prohibition).

Under the “Leveraging of Additional Resources” ranking criterion applicants are encouraged to provide information regarding resources (e.g., cash, in-kind services) that they, or a project partner, would commit to the conferences. Leveraged costs are not limited to allowable costs.

Please note that any costs associated with fund-raising (i.e., to get additional resources) are not allowable and must not be included in the budget for your proposal. In addition, you must make clear, in any solicitation for funds to cover event costs, that your organization, and not EPA, is asking for funding.

The RFA prohibits use of cooperative agreement funds for payment of an administrative cost (per the statutory prohibition on administrative costs). What does EPA consider to be prohibited administrative costs under this RFA?

Prohibited administrative costs are direct costs including those in the form of salaries, benefits, contractual costs, supplies, and data processing charges incurred to comply with most provisions of the “Uniform Administrative Requirements for Grants” contained in 40 CFR Part 30 or 40 CFR Part 31. Direct costs for grant administration are ineligible even if the grantee or sub-grantee is required to carry out the activity under the grant agreement.

Prohibited administrative costs are also **all indirect costs** under OMB Circulars A-21 (Educational Institutions), A-87 (governmental units), A-122 (Non-profit Organizations), and Subpart 31.2 (Commercial Organizations) of the Federal Acquisition Regulation. Indirect costs are those that have been incurred for common or joint purposes. After direct costs have been determined and assigned directly to Federal awards and other activities as appropriate, indirect costs are those remaining to be allocated to benefitted cost objectives. Typical examples of indirect costs for many non-profit organizations may include depreciation or use allowances on buildings and equipment, the costs of operating and maintaining facilities, and general administrative costs, such as the salaries and expenses of executive officers, personnel administration, and accounting.

EPA has determined that the administrative cost prohibition does not apply to “programmatic” costs, i.e., costs for activities that are integral to achieving the purpose of the grant, even if the Agency considered the costs to be “administrative” under the prior Brownfields program. In the case of grants for implementation of Brownfields programs under CERCLA §104(k)(6), programmatic costs would include expenses for providing training, research, and technical assistance. Eligible programmatic costs can include expenses for travel, training, equipment, supplies, reference materials and contractual support if those costs are reasonable and allocable to tasks specified in a grantee’s approved scope of work. Direct costs, as defined in the applicable OMB Cost Principle Circular, for the following programmatic activities are **not** subject to the administrative cost prohibition:

- Costs incurred for complying with procurement provisions of 40 CFR Part 30 and 31 are considered eligible programmatic costs only if the procurement contract is for services or products that are direct costs for research, training, and/or technical assistance.
- Costs for performance and financial reporting required under 40 CFR 30.51 and 30.52, and 40 CFR 31.40 and 31.41 are eligible programmatic costs. Performance and financial reporting are essential programmatic tools for both the recipient and EPA to ensure that grants are carried out in accordance with statutory and regulatory requirements.

The page limitation on the budget is noted as 1 (one) page. The SF424A and SF424B are, of course, several pages. May we assume that besides a one-page budget summary, EPA would like the SF424A and SF424B, budget detail, budget narrative, as well as other required reps and certs, as an appendix?

Yes, budget information exceeding the one page limitation may be included as an appendix.

The following information was provided by ICMA, based on their experience with managing the Travel Scholarship Program for past Brownfields conferences. The table below provides travel scholarship information for the last three conferences.

	BF 2000 - Atlantic City	BF 2001 - Chicago	BF 2002 - Charlotte
Applications	218	222	348
Total Recipients	127	147	151
Full	45	67	87
Partial	82	80	64
Average airfare	\$456.21	\$294.82	\$588.94
Hotel	\$263.43	\$480.00	\$213.00
Per diem	\$42.00	\$46.00	\$38.00

ICMA's note: Please note that not all scholarship recipients receive both airfare and hotel accommodations. Only full scholarship recipients receive airfare, hotel and per diem combined. Partial scholarship benefits have shifted a bit from year to year. In 2002, partial scholarship recipients received hotel accommodations and a \$75 allowance, but had to secure their own airfare/travel.